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35 UNITED STATES DISTRICT COURT
36 NORTHERN DISTRICT OF CALIFORNIA
37 SAN FRANCISCO DIVISION

38 SUN GROUP U.S.A. HARMONY CITY, INC.,

39 No. 3:17-cv-02191-SK

40 Plaintiff,

41 **UNOPPOSED REQUEST FOR**
42 **INTERNATIONAL JUDICIAL**
43 **ASSISTANCE**

44 v.

45 CRRC CORPORATION LTD,
46 Defendant.

47 Courtroom C, 15th Floor
48 U.S. Magistrate Judge Sallie Kim

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UNOPPOSED REQUEST

This Unopposed Request is made by Plaintiff Sun Group U.S.A. Harmony City, Inc. (“Plaintiff”) in order to obtain the Court’s signature and seal on the Hague Convention discovery requests the Court has previously ordered Plaintiff to serve. Defendant CRRC Corporation Ltd. (“Defendant”) has reviewed this Unopposed Request and does not oppose it. Plaintiff therefore requests as follows:

WHEREAS, on November 19, 2019, the Court issued its order requiring Plaintiffs to proceed through the Hague Convention to obtain documents located in China;

WHEREAS, on February 17, 2020, Defendant served amended responses to Plaintiff's requests for production indicating that it would not object to requests substantially similar to those requested in this stipulation;

WHEREAS, Plaintiff has determined that it would be appropriate for the Court to apply its signature and seal to the request filed concurrently with this Unopposed Request; and

WHEREAS, counsel for CRRC has agreed to prepare a log describing documents that CRRC identifies as responsive to the Hague Requests (as ultimately approved by the Chinese judicial authorities) and withholds on the basis of the attorney-client privilege, the attorney work product doctrine, or any other evidentiary privilege against disclosure to Sun Group without the necessity of requesting such a log through the Hague Convention.

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1 **NOW, THEREFORE**, the Court is respectfully requested to sign and affix its seal to the
2 Letter of Request filed concurrently herewith, and either return or make available for pickup an
3 original copy of the same to Sun Group's counsel Frank Busch, so that it may be forwarded to
4 the appropriate judicial authorities in China.

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6 Date: May 15, 2020

GREER, HERZ & ADAMS, L.L.P.

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8 By: /s/

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FILER'S ATTESTATION OF CONCURRENCE

I, Frank Busch, pursuant to Local Rule 5-1(i), attest that I am counsel for Plaintiff Sun Group U.S.A. Harmony City, Inc. As the ECF user and filer of this document, I attest that concurrence in the filing of this document has been obtained from its signatories.

Date: May 15, 2020

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH & RADWICK LLP**

By: s/

FRANK BUSCH
Attorney for Plaintiff
SUN GROUP U.S.A. HARMONY CITY, INC.

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